

Policy Title:	PRIVACY POLICY
Section Heading:	Board Governance
Policy Number:	1.7.
Standard(s):	A13
Policy Statement:	In accordance with its obligations under the Personal Information Protection and Electronic Documents Act (PIPEDA), ROM Governors protects the privacy and confidentiality of donors, sponsors, staff, board members, volunteers, and other stakeholders by ensuring the appropriate treatment and security of their personal information.
Purpose:	Care in collecting, using and disclosing personal information is essential to continued public confidence and goodwill.
Scope:	ROM Governors shares a special relationship with the Royal Ontario Museum, as associated charities, and where appropriate and as per relevant legislation, shares information. ROM Governors is responsible for managing the privacy of personal information under its custody or control. ROM and ROM Governors have a Memorandum of Understanding that ensures the privacy and appropriate management of the personal data of donors and members.
Definition(s):	<p><i><u>Personal Information:</u></i> Any information that can be used to distinguish, identify or contact a specific individual. This information can include opinions or beliefs, as well as facts about, or related to, the individual. Exceptions include business contact information and certain publicly available information, such as names, addresses and telephone numbers which are published in a telephone directory, and therefore are not considered personal information.</p> <p><i><u>Privacy Officer:</u></i> The individual operationalizing the organization’s compliance with all privacy legislation.</p> <p><i><u>Privacy Executive Officer:</u></i> The individual responsible for the organizations’ compliance</p>
Guidelines:	Privacy Principles: These principles are usually referred to as “fair information principles”. They are included in the Personal Information Protection and Electronic Documents Act (PIPEDA).

1. Accountability: An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.
2. Identifying Purposes: The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.
3. Consent: The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.
4. Limiting Collection: The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.
5. Limiting Use, Disclosure, and Retention: Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfilment of those purposes.
6. Accuracy: Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.
7. Safeguards: Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.
8. Openness: An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.
9. Individual Access: Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it

	<p>amended as appropriate.</p> <p>10. <i>Challenging Compliance:</i> An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization’s compliance.</p> <p><i>Source: Officer of the Privacy Commissioner of Canada</i></p>
<p>Procedures: Responsibility</p>	<p>Action</p>
<p>President & CEO</p>	<p>Appoints a Privacy Officer for the organization’s procedural requirements, and an Executive team member for major legal or strategic issues.</p> <p>The responsibilities of the Privacy Officer are to:</p> <ul style="list-style-type: none"> • ensure compliance with PIPEDA for the management of personal information under ROM Governors’ control • regularly review policies and procedures with regard to personal information • provide training to staff and volunteers on information management policies and procedures • respond to requests for access to and correction of personal information and issues concerning personal information • ensure third party contracts (telemarketing, mail houses, freelance writers and designers, etc.) contain a provision explicitly requiring their adherence to PIPEDA to ensure that all forms which pertain to the collection of personal information, identify the name and title of the privacy officer, along with contact information <p>The role of the Executive Privacy Officer overseeing the Privacy function are to:</p> <ul style="list-style-type: none"> • work with the ROM COO and Privacy Officer regarding Freedom of Information & Protection of Privacy in situations where personal information is shared with ROM • work with the Information and Privacy Commissioner of Ontario during any investigation of a privacy complaint against the organization

<p>Privacy Officer</p>	<p>Ensures the privacy policy is publicly accessible on ROM Governors' website.</p> <p>With the Board Secretary, confirms all ROM Governors staff and volunteers sign an agreement related to the confidentiality of personal information.</p> <p>Ensures processes so data is entered into The Raisers Edge database marking donors' requests to remain anonymous.</p> <p>For training and reference, prepares a privacy manual with purpose statements for the various methods and reasons used by ROM Governors to collect personal information on donors, prospects, volunteers and board members. The privacy manual contains the following elements:</p> <ul style="list-style-type: none"> • Privacy Policy (Web Version) • Privacy Principles and Practices • Paper and Electronic Filing Guidelines • Confidentiality Agreement (Board, Staff & Volunteer versions)
<p>Executive Leadership</p>	<p>Does not identify or comment publicly on specific donor contributions without the expressed consent of the donor.</p> <p>Ensures the option for anonymity is included in written requests for donations, gift agreements and donor recognition confirmation forms.</p> <p>Obtains written or verbal confirmation before publishing a donor's name or donation amount, either specifically or as part of a donation range. If the donor is unable to be reached, a name will not be used.</p> <p>Ensures disclosure in gift agreements that the Museum is subject to the Freedom of Information and Protection of Privacy Act (FIPPA) in Ontario which means that a gift agreement may be released to a third party should an access request be submitted under FIPPA.</p>
<p>Contact Person:</p>	<p>ROM Governors Privacy Officer & EVP, Operations</p>

ROM

Governors

Monitoring Tool(s):	Privacy Manual
Relevant Form(s):	Confidentiality Agreement (Board, Staff and Volunteer versions)
Related Policies:	Complaints Policy
Review Frequency:	Annual
Revised Date:	June 6, 2024 (Governance & Nominating Committee)
Approval Date:	June 21, 2024 (Board of Governors)

